IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

UNITED STATES OF AMERICA,)	CRIMINAL NO. 3:22-cr-00654
Plaintiff,)	
V.)	GOVERNMENT'S MOTION FOR
CHRISTOPHER MICHAEL ALEXANDER,)	UPWARD VARIANCE
Defendant.)	

The United States of America, by and through its undersigned counsel, respectfully requests that this Court consider an upward variance from Defendant's current advisory guidelines to a range of 188 to 235 months to be followed by an appropriate term of supervision. Such a sentence would fulfill the statutory purposes of sentencing as set out in Title 18, United States Code, Section 3553(a).

In support of this motion, the United States incorporates herein its forthcoming Sentencing Memorandum in Support of Motion for Upward Variance.

Respectfully submitted,

ADAIR F. BOROUGHS UNITED STATES ATTORNEY

By: s/ Elle E. Klein
Elle E. Klein (#12941)
Assistant U.S. Attorney
1441 Main Street, Suite 500
Columbia, SC 29201
Phone: 803-929-3000

Fax: 803-254-2912 Elle.Klein@usdoj.gov

June 5, 2023 Columbia, South Carolina

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

UNITED STATES OF AMERICA,)	CRIMINAL NO. 3:22-cr-00654
Plaintiff,)	
v.)	
CHRISTOPHER MICHAEL ALEXANDER,)	
Defendant.)	

CERTIFICATE OF SERVICE

I hereby certify that I am an employee in the Office of the United States Attorney for the District of South Carolina, Columbia, South Carolina, and as attorney of record, on June 5, 2023, I caused a legal assistant to serve a true and correct copy of **GOVERNMENT'S MOTION FOR UPWARD VARIANCE** in the above-captioned case, via the court's e-noticing system, but if that means failed, then by regular United States Mail, postage paid, on the following person:

Suha Najjar, Esquire Federal Public Defender's Office 1901 Assembly St., Suite 200 Columbia, SC 29201

By: s/ Elle E. Klein
Elle E. Klein (#12941
Assistant U.S. Attorney
1441 Main Street, Suite 500
Columbia, SC 29201
Phone: 803-929-3000

Fax: 803-254-2912 Elle.Klein@usdoj.gov